

**brownrudnick**

LAUREN TABAKSBLAT  
 212.209.4904  
 LTabaksblat@brownrudnick.com

September 6, 2022

The Honorable Sarah L. Cave  
 Daniel Patrick Moynihan Courthouse  
 500 Pearl Street, Room 1670  
 New York, New York 10007

Plaintiffs' letter-motion seeking to file under seal Plaintiffs' letter-motion concerning the Jefferies Defendants' MBS trading group's practices, and accompanying exhibits (ECF No. 490) is GRANTED, and the documents at ECF No. 491 shall remain visible only to the selected parties.

The Clerk of Court is respectfully directed to close ECF No. 490.

SO ORDERED 09/07/22

  
 SARAH L. CAVE  
 United States Magistrate Judge

**RE: Monterey Bay v. Ambac, Case No. 1:19 Civ. 9193 (PGG)(SLC) (S.D.N.Y.)**  
**Letter Motion Re: Filing Letter Motion and Exhibits Under Seal**

Dear Judge Cave:

Pursuant to Federal Rule of Civil Procedure 5.2(d), Rule I(G)(2) of Your Honor's Individual Practices, this Court's Standing Order No. 19-mc-583, and this Court's ECF Rules & Instructions (the "ECF Rules"), we write seeking the Court's approval for Plaintiffs to file under seal Plaintiffs' Letter Motion seeking Evidence of Defendants Jefferies' MBS Trading Group's Fraudulent Practices (the "Motion") and exhibits, which are being filed contemporaneously with this Letter Motion.

In support of the Motion, Plaintiffs have attached seven (7) exhibits that have been designated by Jefferies as "CONFIDENTIAL" pursuant to the Stipulated Protective Order in this case (ECF Nos. 135 and 425 the "Protective Order"). Pursuant to Paragraph 12.4 of the Protective Order, "[w]ithout written permission from the Designating Party or a court order secured after appropriate notice to all interested persons, a Party may not file in the public record . . . any Protected Material." The Motion quotes directly from these 7 exhibits designated by Jefferies as "CONFIDENTIAL." Accordingly, Plaintiffs are filing the Motion and the exhibits to the Motion under seal and available only to "Selected Parties." (ECF Rule 6.9).

Plaintiffs will meet and confer with Jefferies, the designating party, over the next several days in order to obtain the required written permission for the public filing of a redacted version of the Motion and the sealed exhibits.

The Court's consideration is greatly appreciated.

Sincerely,

**BROWN RUDNICK LLP**



Lauren Tabaksblat